

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

PEDRO V. TRUJILLO	§	
and JEANETTE RUIZ	§	
Plaintiffs,	§	
	§	
v.	§	CIVIL ACTION NO. 5:21-CV-1067
	§	
PARMVEER SINGH and	§	
SK FREIGHTWAYS, INC.	§	
Defendants.	§	

NOTICE OF REMOVAL

TO THE HONORABLE JUDGE OF THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF TEXAS:

1. STATE COURT ACTION

1.1 Now come SK Freightways, Inc. and Parmveer Singh, Defendants in a civil action brought on August 31, 2021, in the 224th District Court of State of Texas, County of Bexar, entitled “Pedro V. Trujillo and Jeanette Ruiz v. Parmveer Singh and SK Freightways, Inc.” Cause No. 2021CI18302. The citation and petition in this action were received by SK Freightways, Inc., Defendant, on October 18, 2021. The citation and petition in this action were received by Parmveer Singh, Defendant, on October 4, 2021. A copy of all process and pleadings filed and/or served in the action are attached.

2. PARTIES

2.1 Plaintiff Pedro V. Trujillo is a citizen of Texas.

2.2 Plaintiff Jeanette Ruiz’s citizenship is unknown but presumed to be Texas.

2.3 Defendant SK Freightways, Inc. is a foreign corporation formed under the laws of the State of California and operating under the laws of the State of California. Defendant’s principal place of business is in the State of California.

2.4 Defendant Parmveer Singh is a citizen of California.

3. JURISDICTION

3.1 This Court has jurisdiction over the subject matter of this cause, pursuant to 28 U.S.C. § 1332 because this is a civil action in which the amount in controversy exceeds the sum or value of \$75,000, exclusive of interest and costs, and is between citizens of different states. Plaintiffs have plead for between \$250,000.00 and \$1,000,000.00 in their Plaintiffs' Original Petition.

3.2 Plaintiffs are residents of Texas as plead by them in their Plaintiffs' Original Petition. Defendant Parmveer Singh is a citizen of the State of California and an individual residing in Victorville, California. Defendant SK Freightways, Inc. is a foreign corporation formed under the laws of the State of California. As both defendants are diverse from the plaintiffs, diversity of citizenship exists.

3.3 Therefore, as this Court has jurisdiction over this cause pursuant to 28 U.S.C. § 1332, this cause is removable to federal court pursuant to 28 U.S.C. §§ 1441 and 1446.

4. VENUE

4.1 Venue is proper in the Western District of Texas under 28 U.S.C. § 1441(a) because the state court where suit has been pending (224th District Court of State of Texas, County of Bexar) is located in the Western District of Texas.

5. PRAYER

5.1 WHEREFORE, SK Freightways, Inc. and Parmveer Singh, pursuant to these statutes and in conformance with the requirements set forth in 28 *U.S.C. § 1446*, remove this action for trial from Cause No. 2021CI18302; Pedro V. Trujillo and Jeanette Ruiz v. Parmveer Singh and

SK Freightways, Inc., in the 224th District Court of State of Texas, County of Bexar on this 28th day of October 2021.

Respectfully submitted,

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SK FREIGHTWAYS, INC., AND
PARMVEER SINGH

*service by email to this address only

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing instrument was forwarded by electronic transmission and/or first-class mail and/or facsimile transmission and/or certified mail, return receipt requested on the 29th day of October, 2021, to:

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